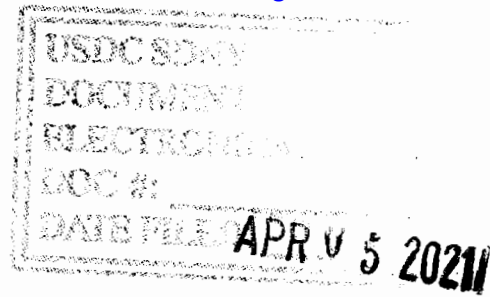


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X
UNITED STATES OF AMERICA :

- v. - :

TELIA COMPANY AB, :

Defendant. :

-----X

17 Cr. 581 (GBD) ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: APR 05 2021

GOVERNMENT'S UNOPPOSED MOTION TO DISMISS INFORMATION

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States of America, by and through undersigned counsel, hereby moves to dismiss the Information filed in the above-captioned case against defendant Telia Company AB (hereinafter "Telia"). In support of this motion, the Government states as follows:

1. On September 21, 2017, the Government filed an Information charging Telia with conspiracy to violate the anti-bribery provisions of the Foreign Corrupt Practices Act of 1977 ("FCPA"), 15 U.S.C. §§ 78dd-1, 78dd-2, and 78dd-3, in violation of 18 U.S.C. § 371. Dkt. #2.

2. On September 21, 2017, the Government also filed a deferred prosecution agreement ("DPA") with Telia, in which the Government deferred prosecution of Telia for a period of three years. Dkt. #6. Among other obligations, the DPA required Telia to cooperate with the Government's investigation and to implement an enhanced compliance program. Telia was also required to pay a criminal monetary penalty of \$548,603,972.

3. The DPA provided that the Government would not continue the criminal prosecution against Telia and would move to dismiss the Information within six months of the expiration of the DPA if Telia fully complied with all of its obligations, including its obligations

to implement a compliance program reasonably designed and implemented to prevent and detect violations of the anti-corruption laws. Dkt. #6, DPA ¶ 10.

4. On August 20, 2020, Telia's Chief Executive Officer and Chief Financial Officer certified to the Government that Telia has met its disclosure obligations pursuant to paragraph 6 of the DPA.

5. The DPA expired on or about September 21, 2020.

6. Based on the information known to the Government, Telia has fully met the obligations under the DPA, including full cooperation with the Government and implementation of an enhanced compliance program and procedures. In addition, Telia has made timely payment of the \$548,603,972 criminal monetary penalty.

7. Because Telia has fully complied with all of its obligations under the DPA, the Government has determined that dismissal of the Information with prejudice is appropriate. *See* Dkt. #6, DPA ¶ 12. The Government has conferred with counsel for Telia, who concurs that dismissal is appropriate at this time.

For the foregoing reasons, the Government requests that this Motion to Dismiss Information be granted.

Respectfully submitted,

DANIEL KAHN
ACTING CHIEF
Fraud Section

/s/ Nicola J. Mrazek

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